

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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COURCHEVEL 1850 LLC,

17-00785 (JBW)(SMG)

Plaintiff

**NOTICE OF CROSS-MOTION TO  
DISMISS AND/OR FOR SUMMARY  
JUDGMENT**

-against-

MOHAMMED ALAM, KOZNITZ I LLC, UNITED  
STATES OF AMERICA (INTERNAL REVENUE  
SERVICE), NY STATE DEPARTMENT OF TAXATION  
AND FINANCE; CITIBANK, N.A.; CITIBANK (SOUTH  
DAKOTA) NEW YORK CITY ENVIRONMENTAL  
CONTROL BOARD; NEW YORK CITY TRANSIT  
ADJUDICATION BUREAU; NEW YORK CITY  
PARKING VIOLATIONS BUREAU,

Defendants.

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**PLEASE TAKE NOTICE**, that upon the annexed Declaration of Solomon Rosengarten, dated the 10<sup>th</sup> day of August 2018, the Memorandum of Law, dated August 10, 2018, the Response to plaintiff's Statement of Undisputed Material Facts and defendant's Statement of Undisputed Material Facts, defendant Koznitz I, LLC will cross-move this Court, at a date and time designated by the Court, at the courthouse, 225 Cadman Plaza East, Brooklyn, New York, for an Order dismissing the complaint pursuant to F.R.Civ.P. 12(b)(1) and/or for summary judgment dismissing the complaint, pursuant to F.R.Civ.P 56(a) and for such other relief as the court may deem just and proper.

**PLEASE TAKE FURTHER NOTICE** that opposition must conform to the requirements of the Federal Rules of Civil Procedure and the Local Rules of this Court and the assigned Judge.

**PLEASE TAKE FURTHER NOTICE** that defendant Koznitz I, LLC requests oral argument.

Dated: Brooklyn, New York  
August 10, 2018

*Solomon Rosengarten*

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Solomon Rosengarten (SR-8050)  
Attorney for Defendant  
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